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12 Attorneys for Plaintiff JENS ERIK SORENSEN,
13 as Trustee of SORENSEN RESEARCH AND
14 DEVELOPMENT TRUST

15 UNITED STATES DISTRICT COURT

16 FOR THE NORTHERN DISTRICT OF CALIFORNIA

17 SORENSEN RESEARCH AND
18 DEVELOPMENT TRUST,

19 Plaintiff,

20 v.

21 FIRST INTERNATIONAL DIGITAL, INC.

22 Defendant.

23 SORENSEN RESEARCH AND
24 DEVELOPMENT TRUST,

25 Plaintiff,

26 v.

27 DIGITAL NETWORKS NORTH AMERICA,
28 Defendant.

Case No. C 075525 JSW

**PLAINTIFF'S RESPONSE TO JUDICIAL
REFERRAL FOR PURPOSE OF
DETERMINING RELATIONSHIP OF
CASES**

Case No. 07-05568 JSW

29 SORENSEN RESEARCH AND
30 DEVELOPMENT TRUST,

31 Plaintiff,

32 v.

33 AMPRO TOOLS CORPORATION

34 Defendant.

Case No. 08-00096 CW

1 Plaintiff Jens Erik Sorensen as Trustee of Sorensen Research and
 2 Development Trust (“Sorensen”) hereby submits its opposition to an order relating
 3 the above-captioned cases for the reasons set forth herein.

4 Pursuant to Civil L.R. 3-12(c), an action is related to another when (1) the
 5 actions concern substantially the same parties, property, transaction or event; and (2)
 6 it appears likely that there will be an unduly burdensome duplication of labor and
 7 expense or conflicting results if the cases are conducted before different Judges.

8 *Sorensen v. First International Digital, Inc., et al*, Case No. 07-05525, does
 9 not meet these criteria because the case does not have any overlapping defendants or
 10 products accused of patent infringement with either of the other two cases, and
 11 because a default judgment has already been entered in the case.

12 *Sorensen v. Digital Networks North America, Inc., et al*, Case No. 07-05568,
 13 does not meet these criteria either because the case does not have any overlapping
 14 defendants or products accused of patent infringement with either of the other two
 15 cases.

16 *Sorensen v. Ampro Tools Corporation*, Case No. 08-00096, does not meet
 17 these criteria because the case does not have any overlapping defendants or products
 18 accused of patent infringement with either of the other two cases, and because
 19 default has already been entered against the Defendant.

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 21 DATED this 31st day of March, 2008.

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 23 JENS ERIK SORENSEN, as Trustee of
 24 SORENSEN RESEARCH AND DEVELOPMENT
 25 TRUST, Plaintiff

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 27 /s/ Melody A. Kramer

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 30 Melody A. Kramer, Esq.
 31 J. Michael Kaler, Esq.
 32 Attorneys for Plaintiff

PROOF OF SERVICE

I, Melody A. Kramer declare: I am and was at the time of this service working within in the County of San Diego, California. I am over the age of 18 year and not a party to the within action. My business address is the Kramer Law Office, Inc., 9930 Mesa Rim Road, Suite 1600, San Diego, California, 92121. I am a member of the State Bar of California and the Bar of this Court.

On March 31, 2008, I served on the parties to this action the following documents:

**PLAINTIFF'S RESPONSE TO JUDICIAL REFERRAL FOR PURPOSE OF
DETERMINING RELATIONSHIP OF CASES**

PERSON(S) SERVED	PARTY(IES) SERVED	METHOD OF SERVICE
David A. Jakopin Theodore K. Bell tad.bell@pillsburylaw.com	Defendant Digital Networks North America, Inc.	Email – Pleadings Filed with the Court
Daniel J. Richert Pillsbury Winthrop et al 2475 Hanover Street Palo Alto, CA 94304-1114 650-233-4545 FAX	Defendant Digital Networks North America, Inc.	Email – Pleadings Filed with the Court

- (Personal Service) I caused to be personally served in a sealed envelope hand-delivered to the office of counsel during regular business hours.
- (Federal Express) I deposited or caused to be deposited today with Federal Express in a sealed envelope containing a true copy of the foregoing documents with fees fully prepaid addressed to the above noted addressee for overnight delivery.
- (Facsimile) I caused a true copy of the foregoing documents to be transmitted by facsimile machine to the above noted addressees. The facsimile transmissions were reported as complete and without error.
- (Email) I emailed a true copy of the foregoing documents to an email address

1 represented to be the correct email address for the above noted addressee.



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7 I declare that the foregoing is true and correct, and that this declaration was executed on Monday,
8 March 31, 2008, in San Diego, California.

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10 /s/ Melody A. Kramer
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10 Melody A. Kramer
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